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**From:** Natalie Nowiski [NNowiski@slb.com]  
**Sent:** 9/11/2020 7:29:14 PM  
**To:** Ho, Yenhung [Ho.Yenhung@epa.gov]; Albright, David [Albright.David@epa.gov]  
**CC:** 'Rebecca Hollis' [rhollis@cleanenergysystems.com]  
**Subject:** RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Thanks for the update, Calvin.

Hope you have a nice weekend!

Best regards,  
Natalie

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**From:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Sent:** Friday, September 11, 2020 11:30 AM  
**To:** Natalie Nowiski <NNowiski@slb.com>; Albright, David <Albright.David@epa.gov>  
**Cc:** 'Rebecca Hollis' <rhollis@cleanenergysystems.com>  
**Subject:** RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Natalie,

We are checking with our regional counsels on this issue and will get back to you when we hear back from them.

Best regards,  
Calvin

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**From:** Natalie Nowiski <NNowiski@slb.com>  
**Sent:** Wednesday, September 9, 2020 1:54 PM  
**To:** Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Cc:** 'Rebecca Hollis' <rhollis@cleanenergysystems.com>  
**Subject:** RE: [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Dear David and Calvin,

Hope you are doing well.

We are hoping you could provide some clarity on a question that has arisen with respect to the ESA and NHPA requirements.

We are currently ascertaining the parameters of the 3D seismic that will be conducted for the Class VI Permitting application. My understanding is that the required land area for this survey (10 – 18 square miles) will be substantially larger than the AoR itself (2.5 square miles). For the purposes of the ESA and NHPA review, does the analysis need to be performed only on the AoR, or does it need to extend to the property that will be included in the 3D seismic?

A variety of permits will be required to be obtained from various government agencies (city, county, state & federal), which likely will require some form of environmental analysis and other pertinent reviews. We understand that the EPA is not involved in the 3-D seismic permitting process; however, since the data from 3D seismic is required as part of the permitting process, it is an incidental action to the Class VI Permit.

Your advice and guidance on this issue would be very much appreciated.

Best regards,  
Natalie

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**From:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>  
**Sent:** Wednesday, August 19, 2020 2:11 PM  
**To:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>  
**Subject:** [Ext] RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Rebecca, just to clarify, we are not intending to go over our letter in today's call. The call was requested by Natalie to discuss status and process of our application review and we just happened to get this letter out today. Hope that helps. David

David Albright  
Manager, Groundwater Protection Section  
USEPA Region 9 (WTR-4-2)  
75 Hawthorne Street  
San Francisco, CA 94105  
415 972-3971


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**From:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>  
**Sent:** Wednesday, August 19, 2020 11:57 AM  
**To:** Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>  
**Subject:** RE: EPA Site Characterization Evaluation of CES Class VI Permit Application

Thank you, Calvin. Received.  
I will review as much as possible before our call.

Best Regards,  
-Rebecca

**Rebecca Hollis**  
**Director Business Development -**

  
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3035 Prospect Park Drive, Suite 120  
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Mobile: 916-798-4114 *← please use this number while CES is working remotely*  
[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)  
*The Power to Reverse Climate Change*

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**From:** Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Sent:** Wednesday, August 19, 2020 11:28 AM  
**To:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>

**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>

**Subject:** EPA Site Characterization Evaluation of CES Class VI Permit Application

Hi Rebecca,

We will upload the attached EPA site characterization evaluation of CES Class VI permit application to the GSDT at a later time, but are providing you a copy of the document for our call today.

Regards,  
Calvin

Calvin Ho  
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U.S. EPA Region 9  
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